## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:		
		Case No. 18-55546-tjt
Janeane Cato,		Chapter 13
		Hon. Thomas J. Tucker
Debtor.		
	/	

### RESPONSE DISAGREEING WITH NOTICE OF FINAL CURE PAYMENT

Now comes Village Green of Farmington Hills Condo, the Debtor's Homeowner's Association for property located at 28422 W. Eight Mile Rd., Unit A7, Farmington Hills, MI 48336 ("Village Green"), through its authorized Attorney Taft Stettinius & Hollister, LLP, and hereby responds to the Trustee's Notice of Final Cure pursuant to F.R. Bankr. P 3002(g):

- 1. Village Green disagrees with the Trustee's notice of final cure payment that Debtor has paid in full the amount required to cure under 11 USC Section 1322(b)(5).
- 2. The Debtor is not current on all payments consistent with 11 USC Section 1322(b)(5).
- 3. Below are itemized items that remain unpaid as of the date of this statement:

TOTAL DUE:	\$2,750.75
Outstanding Monthly Association Fee:	\$877.90
Other Homeowner Violations:	\$150.00
Pet Violations:	\$825.00
Filing Fees and Court Costs:	\$898.75

The monthly association fees comprise a partial outstanding amount of \$265.90 accrued over the term of the Debtor's chapter 13 plan and unpaid association fees for February 2024 of \$306.00 and March 2024 of \$306.00.

Dated: March 4, 2024 Respectfully submitted by:

# TAFT STETTINIUS & HOLLISTER, LLP

/s/Kimberly Ross Clayson

Kimberly Ross Clayson (P69804) 27777 Franklin Road, Suite 2500 Southfield, Michigan 48034

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Counsel for Creditor, Village Green of Farmington Hills Condo

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2024, my office electronically filed the foregoing papers with the Clerk of the Court using the ECF system, which will send notification of such filing to all those listed by the Court as receiving electronic notices in this case from the Court's CM/ECF system.

Dated: March 4, 2024 Respectfully submitted by:

TAFT STETTINIUS & HOLLISTER, LLP

/s/Kimberly Ross Clayson
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Counsel for Creditor, Village Green of Farmington Hills Condo